

Good morning.

My name is Gary Yuknat. I am on the Board of Directors of COWRA – the Connecticut On Site Wastewater Recycling Association. Our membership is primarily comprised of septic system service providers; although among our members you would also find professional engineers, as well as regulators, both on the state and local levels.

As for myself, I have been in this business for over 33 years, have 15 employees, pump, treat and transport more than 3 million gallons of septage each year. We do approximately 100 comprehensive septic system inspections each year for real estate transactions. In addition to those services we locate and map scores of septic systems and their components in order for people to comply with Health Code Requirements normally associated with obtaining a building permit.

In the early days of my career septic inspections didn't exist yet. When first asked, I had no idea what the customer expected or what I could provide, other than my opinion. Over the years, service providers have developed their own unique way to conduct what would become a commonplace occurrence for most real estate transactions.

Presently inspectors are not required to be licensed in the trade to inspect a system, although most are licensed either as system installers or cleaners. Inspectors are free to conduct an inspection in any manner they have adopted. As this evolution has taken place, many issues have arisen. Many have been dealt with by the service provider, however many remain as questions for the Health Department. These questions need to be addressed clearly and definitively, prior to mandating these inspections:

- Who or what would benefit from this new regulation? Is the focus on ground water protection or consumer protection?
- Will inspectors be required to file these reports with the local health department?
- Will health departments be enforcing necessary changes or recommended upgrades?
- What percentage of listed homes with on-site treatment systems are inspected at the present time? We believe a large percentage of buyers are currently having septic systems inspected. Are state and local health departments equipped to handle the added work? Is it worth the added expense?
- Who will be authorized to perform inspections? What are the minimum qualifications? Can an employee work under the owners license?
- Will the State and COWRA develop a training program for inspector certification?
- When should soil testing be required – should this be a part of the inspection?

- What about systems that are too deep in the ground? – as we know there are many systems under water in the spring or sitting on ledge
- Has anyone from the state had any dialogue with their counterparts in Massachusetts or any other state where inspections are mandated – what criteria are they using
- Has the state considered creating a fund available at low interest for septic repairs
- What would the state recommend for undersized systems
- Would all buyer questions be directed to health departments
- What approach would the state take with cesspools

Is the State willing to provide a definition of what a failed system is?

Until such time as we can establish a protocol with prescriptive levels of inspection, we feel this bill, which has its merits, is a bit premature.